

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

STATE OF NEW MEXICO, *ex rel.*  
State Engineer

Plaintiff,

vs.

RAMON ARAGON, *et al.*,

Defendants.

CV 69-7941 BB-ACE

RIO CHAMA STREAM SYSTEM  
Section 7: Rito de Tierra Amarilla,  
Rio Brazos, Rutheron & Plaza Blanca,  
Cañones Creek, Village of Chama

**MOTION TO JOIN ADDITIONAL PARTIES DEFENDANT**

COMES NOW the Plaintiff State of New Mexico, *ex rel.* State Engineer (“State”) and respectfully requests the Court to join as additional parties the persons or entities named below and order them to answer the State’s Complaint in this action as required in any civil action in the United States District Court or suffer default judgment against them. In support of this motion, the State asserts:

1. The persons or entities listed below are diverting and using or may claim the right to divert and use surface or underground waters within the Rio Chama Stream System.

Joseph Valdez	CHTA-003-0045	Rt 4 Box 23B, Hernandez NM 87537
Rachel Valdez	CHTA-003-0045	Rt 4 Box 23B, Hernandez NM 87537
Berthina Romero	CHTA-003-0052	PO Box 38, Tierra Amarilla NM 87575
Roberto Romero	CHTA-003-0052	PO Box 38, Tierra Amarilla NM 87575
Patrick Samora	CHTA-004-0001B	P.O. Box 55, Tierra Amarilla NM 87575

Renee Romero Samora	CHTA-004-0001B	P.O. Box 55, Tierra Amarilla NM 87575
Andrew Romero	CHTA-004-0001C	8115 Rancho Parizo, ABQ NM 87120
Martin Romero	CHTA-004-0001D	6599 Habra Lane NE, ABQ NM 87109
Veronica Romero de Chavez	CHTA-004-0001E	8401 Nampton NE, ABQ NM 87122
Alajandro Chavez	CHTA-004-0001E	8401 Nampton NE, ABQ NM 87122
Dolores Rena Romero	CHTA-004-0001F	4348 Cañada Place NW, ABQ NM 87114
Roman Romero	CHTA-004-0001F	4348 Cañada Place NW, ABQ NM 87114
Rita Madrid	CHRB-003-0003	4817 Shallow Creek Drive, Kennesaw Georgia 30144
Carla A. Vigil	CHRB-003-0003	PO Box 79, Dulce NM 87528
Carol Gomez	CHRB-003-0003	PO Box 811, Dulce NM 87528
Michael Gomez	CHRB-003-0003	PO Box 93, Lumberton NM 87528
George K. Galvan	CHRB-006-0023	PO Box 155, Tierra Amarilla NM 87575
Valentina V. Galvan	CHRB-006-0023	PO Box 155, Tierra Amarilla NM 87575
Beronice I. Arechuleta	CHRB-006-0025A	PO Box 413, Tierra Amarilla NM 87575
Richard Archuleta	CHRB-006-0025C	PO Box 192, Los Ojos NM 87551
Margarita R. Trujillo	CHRB-006-0026 CHRB-007-0008	PO Box 13, Los Ojos NM 87551
Ben and Lucy Maestas Trust	CHRU-004-0023	c/o Mike Chavez, 14332 La Cueva NE, ABQ 87123
Bonsall D. Johnson	CHCV-002-0025	PO Box 967, Chama NM 87520
Wenda L. Johnson	CHCV-002-0025	PO Box 967, Chama NM 87520

Mary Phipps	CHCV-002-0046	c/o Warren F. Phipps, PO Box 4913, Pagosa Springs CO 81157
Warren Phipps	CHCV-002-0046	c/o Warren F. Phipps, PO Box 4913, Pagosa Springs CO 81157
Los Campos de Chama, LLC	CHCV-003-0009 CHCV-004-0002	c/o C. Mott Woolley, Esq., 112 West San Francisco, Santa Fe NM 87501
Andrew Hurd	CHCV-003-0029B	PO Box 745, Chama NM 87520
Daniel Hurd	CHCV-003-0029B	PO Box 745, Chama NM 87520

These waters belong to the public and are subject to appropriation in accordance with laws of the State of New Mexico. This Court has exclusive jurisdiction to adjudicate all claims to the right to divert, store, or use public waters of the Rio Chama Stream System.

2. The persons or entities listed above are in Section 7 of the Rio Chama Stream System, and may be diverting and using water associated with the subfile numbers listed, or may otherwise be using or diverting surface or underground waters within Section 7 of the Rio Chama Stream System.

DATED: October 9, 2003.

Respectfully submitted,

/s/ Ed Newville  
EDWARD G. NEWVILLE  
Special Assistant Attorney General  
Office of State Engineer  
P.O. Box 25102  
Santa Fe, NM 87504-5102  
(505) 827-6150

### **CERTIFICATE OF SERVICE**

I hereby certify that copies of the above Motion to Join Additional Parties Defendant were mailed to following persons on October 10, 2003.

/s/ Ed Newville  
Edward G. Newville

### **RIO CHAMA SECTION 7 SERVICE LIST**

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